

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA : Criminal No.
: :
"VS" : (, J.)
KEVIN HEIMSOOTH and :
CHELSEY THIEVIERGE, :
Defendants :
:

INFORMATION

THE UNITED STATES ATTORNEY CHARGES:

COUNT I

1. From on or about July 1, 2013, until on or about September 26, 2013, in the Middle District of Pennsylvania, the Defendants, KEVIN HEIMSOOTH and CHELSY THIVIERGE, conspired and agreed together to manufacture and utter counterfeit Federal Reserve Notes of the United States of America, in violation of Title 18, United States Code, Sections 471 and 472.

MANNER and MEANS

2. Defendants HEIMSOTH and THIVIERGE used computer equipment to manufacture \$20 and \$100 Federal Reserve Notes.

OVERT ACTS

3. In furtherance of the conspiracy and to effect the objects of the conspiracy the Defendants, HEIMSOTH and THIEVIERGE committed the following overt acts in the Middle District of Pennsylvania and elsewhere:

- a. The Defendants utilized computer equipment consisting of an HP Desktop 3512 copier/scanner/printer, Lenovo Laptop Computer, Belkin Notebook Computer, Transcard Thumb Drive, Belkin Thumb Drive and a miscellaneous thumb drive to manufacture counterfeit \$20 and \$100 Federal Reserve Notes;
- b. From on or about July 1, 2013 to on or about September 26, 2013, the Defendants passed these counterfeit Federal Reserve Notes to various businesses in the Middle District of Pennsylvania and elsewhere.

In violation of Title 18, United States Code, Section 371.

FORFEITURE ALLEGATION

18.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c)

4. The allegations contained in Count 1 of this Information are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

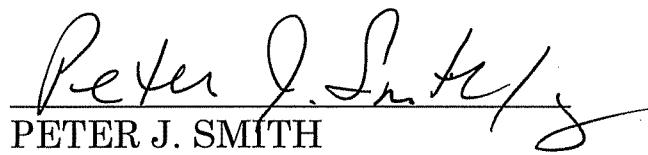
5. Pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), upon conviction of a conspiracy to violate Title 18, United States Code, Sections 471 and 472, in violation of Title 18, United States Code, Section 371, the Defendants, KEVIN HEIMSOTH and CHELSEY THIVIERGE, shall forfeit to the United States of America any property, real or personal, which constitutes or is derived from proceeds traceable to said violations. The property to be forfeited includes, but is not limited to, the following:

- a. Approximately \$698 in United States currency;
- b. HP Desktop 3512 copier/scanner/printer, Lenovo Laptop Computer, Belkin Notebook Computer,

Transcard Thumb Drive, Belkin Thumb Drive and a
miscellaneous thumb drive.

6. If any of the property described above-as a result of any act or
omission of the Defendants:

- a. Cannot be located upon the exercise of due diligence;
- b. Has been transferred or sold to, or deposited with, a
third party;
- c. Has been placed beyond the jurisdiction of the court;
- d. Has been substantially diminished in value; or
- e. Has been commingled with other property which
cannot be divided without difficulty, the United States
of America shall be entitled to forfeiture of substitute
property pursuant to Title 21, United States Code,
Section 853(p), as incorporated by Title 28, United
States Code, Section 2461(c).


PETER J. SMITH
United States Attorney

Date: November 4, 2013